REMARKS

Claims 1-20 are pending in this case.   Claims 1-20 stand rejected under 35 U.S.C. §

112, second paragraph, as being allegedly indefinite. Claims 1-6 and 8-13 stand rejected

under 35 U.S.C. § 102(b) as being allegedly anticipated by "Continual Queries for Internet-

Scale Event Driven Information Delivery" ("Liu"). Claims 7 and 14-20 stand rejected under

35 U.S.C. § 103(a) as being allegedly unpatentable over Liu in view of United States Patent

No. 6,321,236 ("Zollinger"). Applicants respectfully traverse the rejections.

Interview Summary

Applicants' undersigned representative, Mr. Eiferman, and the Examiner participated

in a telephonic interview on February 23, 2006, during which Mr. Eiferman presented the

arguments below with respect to the Liu reference. The Examiner stated that he understood

these arguments, and that he would revisit the Liu reference in light of these arguments.

Rejections under 35 U.S.C. § 112

Claims 1-20 stand rejected under 35 U.S.C. § 112, second paragraph, as being

allegedly indefinite. In particular, the Office Action alleges that independent claims 1, 8 and

15 omit essential claim elements relating to an empty third subset of data. Applicants have

added language related to an empty third dataset to more clearly describe the claimed

invention and to advance prosecution. Accordingly, reconsideration and withdrawal of the 35

U.S.C. § 112 rejections are respectfully requested.

Rejections under 35 U.S.C. § 102

Claims 1-6 and 8-13 stand rejected under 35 U.S.C. § 102(b) as being allegedly

anticipated by "Continual Queries for Internet-Scale Event Driven Information Delivery"

("Liu"). Applicants respectfully disagree and traverse.

The claimed invention is directed to database change notification. In an embodiment

of the claimed invention, a client can subscribe to a first subset of a database, thereby

entitling the client to receive notifications *before* the first subset of the database is about to be

changed. To determine when this happens, the query plans of incoming queries are

supplemented with a subscription plan, and the resulting supplemented plan is evaluated to determine whether its subsequent execution on the underlying database by the execution engine will result in any changes to the first subset of the database. If so, then a change notification is sent to the client. (Application, Summary of the Invention).

Liu is directed to "continual" queries. A continual query is a query that is re-performed *after* every occurrence of a corresponding trigger event. The triggering event must occur prior to the re-performance of the query because the re-performance of the query provides actual updated results (rather than simply a notification of a subsequent update) to a client. (Liu, Pg. 612, Col. 2, ¶ 3). To detect when the trigger event has occurred, the database may be periodically polled or triggers may be set to fire after the database is changed. In contrast to the claimed invention, Liu does not teach or suggest supplementing (or otherwise altering and / or evaluating in any manner) incoming query plans and evaluating supplemented query plans. Rather, because Liu does not re-perform the query until after the database is changed, it is more efficient to simply monitor actual changes to the underlying database than to evaluate incoming query plans.

Accordingly, Liu does not teach or suggest "supplementing the query plan with the subscription plan; and evaluating the supplemented query plan whereby the query changes the second subset of data and the subscription filters the first subset of data from within the second subset of data to form a third subset of data" as recited in independent claims 1 and 8. Thus, Applicants respectfully submit that independent claims 1 and 8 are not anticipated by Liu. Applicants further submit that claims 2-6 and 9-13 are patentable at least by reason of their dependency. Accordingly, reconsideration and withdrawal of the 35 U.S.C. § 102 rejections are respectfully requested.

Rejections under 35 U.S.C. § 103

Claims 7 and 14-20 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Liu in view of United States Patent No. 6,321,236 ("Zollinger"). Applicants respectfully disagree and submit that, for at least the reasons described above, independent claim 15 is patentable over the cited references. Applicants further submit that

claims 7, 14 and 16-20 are patentable at least by reason of their dependency. Accordingly,

reconsideration and withdrawal of the 35 U.S.C. § 103 rejections are respectfully requested.

CONCLUSION

In view of the above remarks, Applicants respectfully submit that the present application is in condition for allowance. Applicants respectfully submit that no new matter is added in the forgoing amendments. In view of the foregoing amendments and following remarks, Applicants respectfully request reconsideration of the present application.

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